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UNITED STATES BANKRUPTCY COURT

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DISTRICT OF NEVADA

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In re

Bankruptcy Case No. BK-S-09-26769-lbr

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JULIAN BETTENCOURT AND MARIA N
21 BETTENCOURT,

Chapter 11

22

Debtor(s).

EMC MORTGAGE CORPORATION'S
REQUEST FOR SPECIAL NOTICE AND
SERVICE OF PAPERS AND
RESERVATION OF RIGHTS

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TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTORS, AND ALL
INTERESTED PARTIES

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PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for EMC Mortgage Corporation, hereby requests special notice of all events relevant to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors committees and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

1 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master
2 Mailing List in this case, the following address be used:

3 ACE VAN PATTEN, ESQ.
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San Diego, CA 92177-0933

6 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of
7 claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the
8 within party's:

9 a. Right to have any and all final orders in any and all non-core matters entered only
10 after de novo review by a United States District Court Judge;

11 c. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant
12 proceeding by Fed. R. Bankr. P. 7004;

13 d. Right to trial by jury in any proceeding as to any and all matters so triable herein,
14 whether or not the same be designated legal or private rights, or in any case, controversy or
15 proceeding related hereto, notwithstanding the designation or not of such matters as "core
16 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to
17 statute or the United States Constitution;

18 e. Right to have the reference of this matter withdrawn by the United States District
19 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

20 f. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which
21 this party is entitled under any agreements at law or in equity or under the United States
22 Constitution.

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1 All of the above rights are expressly reserved and preserved by this party without exception
2 and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other
3 participation in these matters.

4 Dated: March 12, 2010 /s/ Ace Van Patten
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9 NV Bar #11731
10 Attorney for EMC MORTGAGE CORPORATION

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